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5      San Diego, California 92101  
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7      Attorneys for Complainant

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12      BEFORE THE DIVISION OF MEDICAL QUALITY  
13      BOARD OF MEDICAL QUALITY ASSURANCE  
14      DEPARTMENT OF CONSUMER AFFAIRS  
15      STATE OF CALIFORNIA

16      In the Matter of the Accusation ) NO. D-2490  
17      Against:

18      PAUL JARAND, M. D. )  
19      705 Palm Avenue ) STIPULATION AND  
20      Imperial Beach, California ) DECISION OF THE  
21      Certificate No. A-15602 ) BOARD  
22      Respondent )

23      In the interests of a prompt and speedy settlement of  
24      this matter, consistent with the public interest and the  
25      responsibilities of the Board of Medical Quality Assurance (Board),  
26      the parties submit this Stipulation to the Division of Medical  
27      Quality of the Board for its approval and adoption as the final  
disposition of the accusation.

28      The parties stipulate the following is true:

- 29      1. An accusation has been served on respondent Paul  
30      Jarand, M. D., and he has filed a notice of defense.

1           2. Respondent has fully discussed with his counsel,  
2 McCormick & Royce, by Patrick A. McCormick, Jr., and Jack Winters,  
3 the charges and allegations of violations of the Business and  
4 Professions Code alleged in the accusation and supplemental  
5 accusation and has been fully advised of his right to a formal  
6 hearing and an opportunity to defend against the charges,  
7 reconsideration, and appeal from any adverse decision which might  
8 be rendered following the hearing.

9           3. Respondent knowingly and intelligently waives all  
10 rights to a hearing, reconsideration and appeal, and any and all  
11 other rights which may be accorded him pursuant to the  
12 Administrative Procedure Act.

13           4. Respondent admits that each and every allegation  
14 of the accusation and supplemental accusation as amended during  
15 the administrative hearing is true and cause exists thereby to  
16 impose discipline upon his license. The foregoing admissions are  
17 made for this stipulation only, and in the event this stipulation  
18 and decision is not adopted, the admissions shall be inadmissible  
19 in any proceeding involving the parties to it.

20           5. Concomitantly with the execution of this stipulation  
21 and decision, respondent agrees to withdraw and dismiss his  
22 appeal from San Diego County Superior Court Case No. 452952,  
23 Paul Jarand vs. Board of Medical Quality Assurance, and agrees to  
24 take no action to prosecute any appeal from the superior court's  
25 judgment.

1 WHEREFORE, THE PARTIES STIPULATE THE BOARD MAY ENTER  
2 THE FOLLOWING ORDER:

3 The Physician's and Surgeon's certificate issued to  
4 respondent, Paul Jarand, M.D., is revoked. Upon satisfaction of  
5 conditions 1, 2, 3 and 4 revocation shall be stayed and respondent  
6 placed on probation for ten (10) years. The period of probation  
7 shall not begin and respondent's certificate shall remain revoked  
8 until conditions 1, 2, 3 and 4 have been satisfied.

9                    CONDITIONS

10                1. Respondent's certificate is suspended for six (6)  
11 months from the effective date of this decision.

12                2. Before resuming practice, respondent must take and  
13 successfully pass an oral/clinical examination in general medicine  
14 to be administered by the Division's designee.

15                If respondent does not pass the first examination, he  
16 will be entitled to reexamination, but not before two months from  
17 the date of the first examination.

18                If respondent does not pass the second examination, he  
19 will be entitled to reexamination, but not before four months from  
20 the date of the first examination.

21                The respondent shall be responsible for the examination  
22 costs after the first examination.

23                3. Before resuming practice, respondent must submit to  
24 the Division, and receive its prior approval, for a plan of  
25 practice limited to a structured environment in which respondent's  
26 activities will be supervised by another physician.

27                Respondent shall not engage in solo practice without the  
28 prior approval of the Board. (C.G.)

1           4. On the effective date of this decision, respondent  
2 shall surrender to Division of Medical Quality of Board of  
3 Medical Quality Assurance of the Department of Consumer Affairs,  
4 or the Drug Enforcement Administration, the following:

- 5           (a) Drug Enforcement Administration Certificate  
6           for dangerous drugs as defined in sections 11054  
7           through 11058 of the Health and Safety Code;  
8           (b) Triplicate books;  
9           (c) Any and all federal purchase order forms;  
10          (d) Any and all Schedule 2, 2n, 3, 3n, 4, 4n,  
11          and 5 and 5n drugs which respondent has in his  
12          possession or under his control.

13          During probation respondent must comply with the  
14 following conditions:

15          1. Respondent must obey all federal, state and local  
16 laws, and all rules governing the practice of medicine in  
17 California.

18          2. Respondent must submit quarterly declarations under  
19 penalty of perjury on forms provided by the Division, within  
20 thirty (30) days of the end of each quarter, stating whether there  
21 has been compliance with all the conditions of probation.

22          3. Respondent must comply with the Division's probation  
23 surveillance program.

24          4. Respondent must appear in person for interviews with  
25 the Division's medical consultant upon request at various  
26 intervals and with reasonable notice.

27          ///

28          ///

1       5. In the event respondent should leave California to  
2 reside or to practice outside the State, respondent must notify  
3 the Division of the dates of departure and return. Periods of  
4 residency or practice outside California will not apply to the  
5 reduction of this probationary period.

6       6. Respondent shall not prescribe, furnish, or  
7 administer any Schedule 1, 2, 2n, 3, 3n, 4, 4n, or 5, or 5n drugs  
8 as defined in sections 11054 through 11058 of the Health and  
9 Safety Code, and shall not reapply for such privileges without  
10 the written consent of the Board. Respondent also shall not  
11 possess any such controlled substance unless pursuant to a valid  
12 prescription issued by a licensed physician and surgeon or  
13 osteopath for a condition for which that physician and surgeon  
14 or osteopath is treating respondent.

15      7. During each of the first five (5) years of  
16 probation, respondent shall successfully take and complete fifty  
17 (50) hours of approved continuing medical education in addition  
18 to the usually required continuing medical education.

19      8. If respondent violates probation in any respect,  
20 after giving respondent notice and the opportunity to be heard,  
21 the Division may move to set aside the stay order and impose  
22 the revocation of the respondent's certificate.

23      9. Upon successful completion of probation, respondent's  
24 certificate will be fully restored.

25  
26 DATED: 12/2/80

*Paul Jarand*  
PAUL JARAND, M. D.  
Respondent

1 DATED: 12/3/80

*McCormick & Royce*  
by PATRICK A. McCORMICK, JR.  
Attorneys for Respondent

2  
3  
4  
5 DATED: 1/25/81

*Robert Rowland*  
ROBERT ROWLAND  
Executive Director  
Board of Medical Quality Assurance  
Complainant

6  
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9  
10 DATED: 1/9/81

*Lawrence C. Kuperman*  
LAWRENCE C. KUPERMAN  
Deputy Attorney General  
Attorney for Complainant

11  
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13  
14 The foregoing stipulation has been adopted by the  
15 Division of Medical Quality and shall constitute its decision in  
16 the above matter effective on the 18th day of April  
17 1981.

18 DATED: March 19, 1981

*J. M. Deearis*  
MILLER MRDEARIS, Secretary-Treasurer  
Division of Medical Quality  
Board of Medical Quality Assurance

REDACTED

**Attorneys for Complainant**

BEFORE THE

## BOARD OF MEDICAL QUALITY ASSURANCE

**DIVISION OF MEDICAL QUALITY**

**DEPARTMENT OF CONSUMER AFFAIRS**

**STATE OF CALIFORNIA**

13. In the Matter of the Accusation ) NO. D-2490  
Against:

Digitized by srujanika@gmail.com

PAUL JARAND, M.D.  
705 Palm Avenue  
Imperial Beach, California  
Physician's and Surgeon's  
Certificate No. A-15602

Respondent:

20 Complainant, Robert Rowland, alleges:

21           1. He is the Executive Director of the Board of  
22 Medical Quality Assurance and makes this accusation in his  
23 official capacity.

24           2. The respondent, Paul Jarand, M.D., has been  
25 issued physician's and surgeon's certificate number A-15602 by  
26 the Board, and was, and is now licensed to practice medicine  
27 and surgery in the State of California.

1           3. Business and Professions Code section 2360 and  
2         2361 authorize the Board of Medical Quality Assurance to take  
3         disciplinary action against the holder of a physician's and  
4         surgeon's certificate who is guilty of unprofessional conduct.

5           4. Business and Professions Code section 2361(b)  
6         provides that the Division of Medical Quality shall take disci-  
7         plinary action against the holder of a certificate who has  
8         committed acts of gross negligence.

9           5. Business and Professions Code section 2361(c)  
10       provides the Division of Medical Quality shall take disciplinary  
11       action against the holder of a certificate who has committed  
12       repeated similar negligent acts.

13           6. Business and Professions Code section 2361(d)  
14       provides that the Division of Medical Quality shall take  
15       disciplinary action against the holder of a certificate who is  
16       guilty of incompetence.

17           7. Until January 1, 1978, Business and Professions  
18       Code section 2361.5 provided in part that the clearly excessive  
19       prescribing or administering of drugs as determined by the  
20       customary practice and standards of the local community of  
21       licensees, is unprofessional conduct.

22           8. Section 700 of the Business and Professions Code  
23       provides in pertinent part that repeated acts of clearly  
24       excessive prescribing or administering of drugs or treatment,  
25       as determined by the standard of the local community of licensees  
26       is unprofessionsl conduct for a physician and surgeon.

1           9. Section 2399.5 of the Business and Professions  
2         Code provides in pertinent part that prescribing, dispensing,  
3         or furnishing dangerous drugs without a good faith prior  
4         examination and medical indication therefor is unprofessional  
5         conduct.

6           10. Business and Professions Code section 2391 pro-  
7         vides, in part, that the prescribing of any controlled substance  
8         as defined in Health and Safety Code section 11055 or any  
9         dangerous drug as defined in Business and Professions Code  
10         section 4211, to an addict constitutes unprofessional conduct.

11          11. Business and Professions Code section 2391.5  
12         provides, in part, that violation of any of the statutes or  
13         rules or regulations of this state regulating dangerous drugs  
14         or controlled substances constitutes unprofessional conduct.

15          12. Health and Safety Code section 11156 provides,  
16         in part, that no person shall prescribe for or administer or  
17         dispense a controlled substance to an addict or habitual user,  
18         or to any person representing himself as such, except as  
19         permitted by the Health and Safety Code.

20          13. Health and Safety Code section 11190 provides  
21         that a physician who issues a prescription, or dispenses or  
22         administers a controlled substance classified in Health and  
23         Safety Code section 11055, shall make a record that as to the  
24         transaction, shows all of the following:

- 25         a. The name and address of the patient;
- 26         b. The date;
- 27         c. The character and quantity of controlled  
28         substances involved; and

1                   d. The pathology and purpose for which the  
2                   prescription is issued, or the controlled substances  
3                   administered, prescribed or dispensed.

4                   14. At all times mentioned herein, the drugs Preludin,  
5                   Dexedrine, Biphetamine, Eskatrol, Obetrol, Dexamyl, Dexoxyn, and  
6                   Amphetamine, were Schedule II controlled substances as defined  
7                   by Health and Safety Code section 11055, and dangerous drugs  
8                   as defined by Business and Professions Code section 4211.

9                   15. At all times mentioned herein, the drugs Nembutal,  
10                  Quaalude, and Seconal were Schedule III controlled substances as  
11                  defined by Health and Safety Code section 11056 and dangerous  
12                  drugs as defined by Business and Professions Code section 4211.

13                  16. At all times mentioned herein, the drugs, Mepro-  
14                  bromate, Placidyl, and Chlorhydrate, were Schedule IV controlled  
15                  substances as defined by Health and Safety Code section 10057,  
16                  and dangerous drugs as defined by Health and Safety Code section  
17                  4211.

18                  17. At all times mentioned herein, Thorazine, Lasix,  
19                  Elavil, Norpramine, Ortho Novum, Serax, Librium, Valium, Darvon,  
20                  Darvocet, Dalmane, and Atarax were dangerous drugs, as defined  
21                  by Business and Professions Code section 4211.

22                  18. The license of respondent is subject to disci-  
23                  plinary action pursuant to Business and Professions Code sections  
24                  2390 and 2391.5 (for violating Health and Safety Code section  
25                  11156) because on or about 8/10/77, respondent prescribed 30  
26                  Biphetamine 20, Elavil 50, and 100 Lasix 40 to patient F.W.  
27                  and on or about September 6, 1977, respondent prescribed 30

1 Biphetamine 20, Elavil 50, and 100 Lasix 40 to F.W. At all  
2 times mentioned, F.W. was an addict and represented to  
3 respondent that she was an addict. On or about September  
4 10, 1977, F.W. overdosed on drugs, including Biphetamine and  
5 Elavil.

6 19. The license of respondent is subject to  
7 disciplinary action pursuant to Business and Professions Code  
8 sections 2399.5 and 2391.5, 2361.5, 700, 2361(b), 2361(c),  
9 2361(d), and Health and Safety Code section 11190 because  
10 respondent prescribed the drugs, and committed the other  
11 acts or omissions as set forth in exhibit A, the contents  
12 of which are incorporated herein as though fully set forth.

13 WHEREFORE, complainant requests that the Division  
14 of Medical Quality hold a hearing on the matters alleged, and  
15 following the hearing, take such action as provided for in  
16 section 2372 of the Business and Professions Code, and take  
17 such other action as may be proper.

18 Dated: December 6, 1979

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20  
21 ROBERT ROWLAND  
22 Executive Director  
23 Board of Medical Quality Assurance  
24  
25  
26  
27  
Complainant

**EXHIBIT A**

## PATIENT

FEB. 4, 1911

## PATIENT

G.M. #2

PATIENT

P.G. #3

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive (prior to 1978))	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	HGS CODE § 11190 (Failure to maintain records)
7/2/73	Dexedrine 15	N/A		X						
8/9/73	"	" "		X						
10/15/73	"	" "		X						
11/7/73	"	" "		X						
11/9/73	"	" 30		X						
11/30/73	"	N/A		X						
12/14/73	"	15		X						
12/20/73	Elevil NA	N/A		X						
	Ztarax 25	N/A		X						
1/3/74	Dexedrine 15	N/A		X						
2/4/74	"	15		X						
3/4/74	"	N/A		X						
	Elevil 25	" "		X						
3/18/74	Dexedrine 15	" "		X						
4/17/74	"	" "		X						
4/8/74	"	" 30		X						
4/18/74	"	" 30		X						
8/23/75	"	N/A	X	X		X	X*	X*		
9/3/75	Dexedrine 5	" "	X	X		X	X*	X*		

PATIENT

R.G. #3  
page 2

LITE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi-cal indica-tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli-gence)	B&P CODE § 52361(d) (incompe-tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	B&P CODE § 11190 (Failure to maintain records)
10/3/75	Dexedrine 15	N/A	X	X		X	X*	X*		
11/3/75	Dexedrine 5	" "	X	X		X	X*	X*		
11/11/75	" "	100	X	X		X	X*	X*		
12/1/75	" "	" "	X	X		X	X*	X*		
1/2/75	" "	N/A	X	X		X	X*	X*		
	Elavil 5 mg.	N/A	X	X		X	X*	X*		
1/5/76	Dexedrine 5	10	X	X		X	X*	X*		
2/5/76	" "	N/A	X	X		X	X*	X*		
2/13/76	Elavil NA	N/A	X	X		X	X*	X*		
3/1/76	Dexedrine 5	100	X	X		X	X*	X*		
4/16/76	" "	50	X	X		X	X*	X*		
7/9/76	" "	N/A	X	X		X	X*	X*		
8/12/76	" "	100	X	X		X	X*	X*		
9/16/76	" "	N/A	X	X		X	X*	X*		
1/1/76	" "	100	X	X		X	X*	X*		
	Elavil 25	N/A	X	X		X	X*	X*		
11/2/76	" "		X	X		X	X*	X*		
	Dexedrine 15	100	X	X		X	X*	X*		

PATIENT

P.G. #3

page 3

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Cross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
11/11/76	Dexedrine 15	100	X	X		X	X*	X*		
12/6/76	" "	"	X	X		X	X*	X*		
1/10/77	" "	100	X	X		X	X*	X*		
1/17/77	" "	"	X	X		X	X*	X*		X*
	Placidyl	N/A	X	X		X	X*	X*		X*
	Dalmane 15	60	X	X		X	X*	X*		X*
1/13/77	Darvon ASA	N/A	X	X		X	X*	X*		X*
2/9/77	Dexedrine 5	100	X	X		X	X*	X*		X*
	Dalmane	N/A	X	X		X	X*	X*		X*
2/15/77	Darvon ASA	100	X	X		X	X*	X*		X*
2/23/77	Darvocet	100	X	X		X	X*	X*		X*
3/7/77	Dexedrine 5	100	X	X		X	X*	X*		X*
	Dalmane	N/A	X	X		X	X*	X*		X*
3/28/77	Darvon N	N/A	X	X		X	X*	X*		X*
3/1/77	Amphetamine 10mg		X	X		X	X*	X*		X*
3/31/77	" "		X	X		X	X*	X*		X*
4/1/77	" "		X	X		X	X*	X*		X*
4/11/77	" "		X	X		X	X*	X*		X*

PATIENT

P.G. #3

page 4

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 703 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	HGS CODE § 11190 (Failure to maintain records)
6/6/77	Darvocet 100	100	X	X		X	X*	X*	X*	
	Dalmane 50	60	X	X		X	X*	X*	X*	
7/14/77	Dexedrine 5	100	X	X		X	X*	X*	X*	
8/5/77	" "	"	X	X		X	X*	X*	X*	
8/17/77	" "	"	X	X		X	X*	X*	X*	
	Elavil 25	N/A	X	X		X	X*	X*	X*	
9/1/77	Dexedrine 5	100	X	X		X	X*	X*	X*	
9/27/77	" "	"	X	X		X	X*	X*	X*	
10/3/77	" "	"	X	X		X	X*	X*	X*	
10/17/77	Valium 10	100	X	X		X	X*	X*	X*	
10/28/77	Dexedrine 5	100	X	X		X	X*	X*	X*	
	Lesix 40	N/A	X	X		X	X*	X*	X*	
11/11/77	Dexedrine 5	100	X	X		X	X*	X*	X*	
11/16/77	Darvon N	N/A	X	X		X	X*	X*	X*	
11/17/77	" "	100	X	X		X	X*	X*	X*	
	Dexedrine 5	100	X	X		X	X*	X*	X*	
1/4/78	" "	"	X	X	X		X*	X*	X*	
	Darvocet N	N/A	X	X	X		X*	X*	X*	

PATIENT

P.G. #3  
page 5

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
1/31/78	Dexedrine 5	100	X	X	X		X*	X*	X*	
	Darvon	N/A	X	X	X		X*	X*	X*	
2/22/78	Darvon N	"	X	X	X		X*	X*	X*	
	Dexedrine 5	100	X	X	X		X*	X*	X*	
3/0/78	"	"	X	X	X		X*	X*	X*	
	Darvon N	100	X	X	X		X*	X*	X*	

\* The charges of gross negligence, incompetence, and repeated acts of negligence are based upon the fact that respondent prescribed controlled substances and dangerous drugs to Pamela G., an unstable, suicidal person, who had a history of drug abuse including hospitalization for overdosing. In fact, respondent continued to prescribe drugs to P.G. even after she overdosed on 3/17/77 on Placidyl, prescribed by respondent.

PATIENT

S.P. #4

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	R&P CODE 2399.5 (No good faith exam)	R&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&P CODE § 11190 (Failure to maintain records)
4/8/76	Dexedrine 15	30		X		X				
		30					X			
	Hydro Chloride 100			X			X			
5/4/76	Dexedrine 15	N/A		X		X				
6/4/76	" "	30		X		X				
7/1/76	" "	30		X		X				
	Lasix 40	100	X	X		X				
9/8/76	Dexedrine 15	30		X		X				
10/5/76	" "	"		X		X				
11/9/76	" "	"		X		X				
1/17/77	" "	"		X		X				
	Lasix 40	100	X	X		X				
2/15/77	Biphetamine 20	N/A		X		X				X
3/11/77	Obetrol 20	30		X		X				
4/12/77	" "	"		X		X				
	Lasix 40	"	X	X		X				
5/20/77	Obetrol 20	N/A		X		X				X
6/3/77	Obetrol	N/A		X		X				X
6/27/77	Obetrol 20	N/A		X		X				X

PATIENT

S.P. #4

page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE § 399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	MIS-COM- § 11190 (Failure to maintain records)
4/8/76	Lasix 40	N/A	X	X		X				
8/11/77	" "	"	X	X		X				
	Biphetamine 20	30	X	X		X				
	Elavil 50	N/A		X		X				
8/77	" "	N/A		X		X				
	Lasix 40	N/A	X	X		X				
	Biphetamine 20	30		X		X				
11/15/77	" "	60	X	X		X				
	Norpramine 50	N/A		X		X				
1-1/2	Nembutal gr.	30		X		X				
12/19/77	" "	"		X		X				
	Elavil 50	N/A		X		X				
	Biphetamine 20	60	X	X		X				
2/7/78	Dexedrine 15	60	X	X	X	X*				
7/78	Biphetamine 20	60	X	X	X	X*				
	Elavil 50	N/A			X	X*				
4/10/78	" "	"			X	X*				
	Biphetamine 20	60	X	X	X	X*				

## PATIENT

S.F. #4  
page 3

PATIENT

P.L. #5

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive (prior to 1976))	R&P CODE § 2361(b) (Gross negli- gence)	S&P CODE § 52361(d) (incapaci- tance)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	R&S CODE § 11190 (Failure to maintain records)
5/14/76	Dexedrine 15	30	X	X		X				
7/8/76	Dexedrine 5	100	X	X		X				
	Lasix NA	N/A	X	X		X				
9/14/76	Lasix 40	N/A	X	X		X				
	Dexedrine 5	100	X	X		X				
10/26/76	" "	N/A	X	X		X				
	Lasix 40	N/A	X	X		X				
11/18/76	" "	"	X	X		X				
	Dexedrine 5	100	X	X		X				
12/15/76	" "	"	X	X		X				
12/29/76	Lasix 40	N/A	X	X		X			X*	
2/14/77	" "	100	X	X		X			X*	
	Dexedrine 5	100	X	X		X				
3/11/77	" "	N/A	X	X		X				X
	Lasix 40	N/A	X	X		X			X*	
4/19/77	" "	"	X	X		X			X*	
	Dexedrine 5	100	X	X		X				
5/19/77	" "	"	X	X		X				

PATIENT

P.L. #5

page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1979])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (Incompe- tence)	B&P CODE § 2361(c). (Repeated similar acts of negligence)	RES. CODE § 111.90 (Failure to maintain records)
	Lasix 40	100	X	X		X			X*	
6/16/77	" "	N/A	X	X		X			X*	
	Dexedrine 5	100	X	X		X				
7/20/77	" "	"	X	X		X				
	Lasix 40	N/A	X	X		X			X*	
7/14/77	" "	"	X	X		X			X*	
	Dexedrine 5	100	X	X		X				
11/8/77	" "	"	X	X		X				
	Lasix 40	N/A	X	X		X			X*	
12/8/77	" "	"	X	X		X			X*	
	Dexedrine 5	100	X	X		X				
1/12/78	" "	"	X	X	X					
	Lasix 40	N/A	X	X	X				X*	
2/10/78	" "	"	X	X	X					
	Dexedrine 15	30	X	X	X					
3/8/78	Dexedrine 5	100	X	X	X					
4/6/78	" "	"	X	X	X					
	Lasix 50	N/A	X	X	X				X*	

PATIENT

P.L. #5

page 3

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(e) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
5/3/78	Lasix 50	N/A	X	X	X				X*	
	Dexedrine 5	100	X	X	X					
6/1/78	"	"	X	X	X					
	Lasix 50	N/A	X	X	X				X**	
7/78	Lasix 40	"	X	X	X			X**	X**	X**
	Dexedrine 5	100	X	X	X					
8/1/78	"	"	X	X	X					
	Lasix 40	N/A	X	X	X			X**	X**	X**
9/1/78	"	X	X	X		X*	X*	X*	X*	
	Dexedrine 5	100	X	X	X					

\* The charges of incompetence between 12/15/78 and 6/1/78 is based upon the fact that respondent prescribed Lasix to P.L. during this period without appropriate monitoring and consultation. P.L. developed hypocalcemia secondary to chronic Lasix abuse.

The charges of gross negligence, repeated negligent acts and incompetence between 6/1/78 and 9/1/78 are based upon the fact that respondent continued to prescribe Lasix for P.L. after respondent was advised that P.L. developed hypocalcemia secondary to chronic Lasix abuse, and that respondent should cease prescribing Lasix and obtain a urology consultation. Respondent did not obtain the consultation.

PATIENT

P.C. #6

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation.)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE: § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE: § 11.190 (Failure to maintain records)
12/5/73	Dexedrine 15	N/A		X		X				
12/27/73	"	"		X		X				
1/7/74	"	"		X		X				
1/14/74	"	"		X		X	X*			
1/74	"	"		X		X	X*			
3/1/74	"	"		X		X	X*			
4/2/74	"	"		X		X	X*			
4/11/74	"	"		X		X	X*			
5/7/74	"	"		X		X	X*			
6/6/74	Obetrol 20	"		X		X	X*			
6/27/74	"	"		X		X	X*			
8/12/74	"	"		X		X	X*			
9/10/74	"	"		X		X	X*			
10/11/74	Dexedrine 15	"		X		X	X*			
11/4/74	Eskatrol 15	"		X		X	X*			
11/18/74	Obetrol 20	"		X		X	X*			
12/17/74	"	"		X		X	X*			
1/14/75	"	"		X		X	X*			

PATIENT

P.C. #6

page 3

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CCDE § 2361(c) (Repeated similar acts of negligence)	HES CODE § 11190 (Failure to maintain records)
8/23/77	Dexedrine 15	30		X		X*		X*		X*
9/19/77	"	"		X		X	X*	X*		X*
10/17/77	"	"		X		X	X*	X*		X*
11/11/77	"	"		X		X	X*	X*		X*
9/77	"	60		X		X	X*	X*		X*
1/13/78	"	"		X	X		X*	X*		X*
2/21/78	"	"		X	X		X*	X*		X*
3/14/78	Dexedrine 15	"		X	X		X*	X*		X*
4/11/78	Biphetamine 20	60		X	X		X*	X*		X*
5/11/78	"	"		X	X		X*	X*		X*
6/12/78	"	"		X	X		X*	X*		X*
7/12/78	"	"		X	X		X*	X*		X*
8/10/78	"	"		X	X		X*	X*		X*
9/9/78	"	"		X	X		X*	X*		X*

\* These charges are based upon the fact that between 1/14/74 and 9/9/78, respondent prescribed controlled substances and dangerous drugs to P.C. who respondent believed was unstable and depressed and, who reported that she was considering suicide.

PATIENT

P.C. 16

page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CJDE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
2/12/75	Obetrol 20	N/A		X		X	X*	X*		
3/11/75	Biphetamine 20	30		X		X	X*	X*		
4/12/76	" "	"		X		X	X*	X*		
5/11/76	" "	"		X		X	X*	X*		
6/1/76	" "	"		X		X	X*	X*		
8/10/76	" "	N/A		X		X	X*	X*		
9/13/76	" "	"		X		X	X*	X*		
10/18/76	" "	"		X		X	X*	X*		
11/18/76	Dexedrine 15	30		X		X	X*	X*		
12/17/76	Biphetamine 20	30		X		X	X*	X*		
1/4/77	" "	N/A		X		X	X*	X*		X
1/28/77	" "	"		X		X	X*	X*		X
3/7/77	Dexedrine 15	30		X		X	X*	X*		X
3/29/77	" "	"		X		X	X*	X*		X
4/1/77	" "	"		X		X	X*	X*		X
5/24/77	" "	"		X		X	X*	X*		X
6/27/77	" "	"		X		X	X*	X*		X
7/26/77	Biphetamine 20	"		X		X	X*	X*		X

PATIENT

J.D. #7  
page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive (prior to 1978))	B&P CODE § 2361(b) (Gross, negli- gence)	B&P CODE § 523(1(d)) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	B&P CODE § 11190 (Failure to maintain records)
8/27/74	Eskatrol	N/A	X	X		X				
1/2/75	Dexedrine 15	"	X	X		X				
	Elavil 25	"	X	X		X				
3/21/75	Dexedrine 15	"	X	X		X				
	Elavil	"	X	X		X				
4/16/75	Dexedrine 15	"	X	X		X				
5/20/75	"	"	X	X		X				
	Elavil 25	"	X	X		X				
7/29/75	Dexedrine 15	"	X	X		X				
8/26/75	Obetrol 20	"	X	X		X				
	Elavil 25	"	X	X		X				
9/18/75	Obetrol 20	"	X	X		X				
	Elavil 25	"	X	X		X				
10/3/75	Dexedrine 15	"	X	X		X				
	Elavil 50	"	X	X		X				
11/12/75	Dexedrine 15	"	X	X		X				
	Elavil 50	"	X	X		X				
12/9/75	Biphetamine 20	"	X	X		X				

PATIENT

J.D. #7

Page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CGDE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive (prior to 1978))	B&P CODE § 2361(L) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CCDE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
1/15/76	Biphetamine 20	N/A	X	X		X				
	Elavil 50	"	X	X		X				
3/10/76	Biphetamine 20	30	X	X		X				
	Elavil 25	N/A	X	X		X				
'76	Elavil 50	"	X	X		X				
	Biphetamine 20	"	X	X		X				
4/27/76	"	"	X	X		X				
	Elavil 50	"	X	X		X				
6/3/76	"	"	X	X		X				
	Biphetamine 20	"	X	X		X				
6/29/76	Desoxyn 15	30	X	X		X				
	Elavil 25	N/A	X	X		X				
	Lasix 40	"	X	X		X				
8/3/76	Biphetamine 20	"	X	X		X				
	Elavil 25	"	X	X		X				
8/3/76	Lasix 40	"	X	X		X				
8/27/76	Biphetamine 20	"	X	X		X				
	Elavil 25	"	X	X		X				

PATIENT

J.D. #7

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DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(a) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)"	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&SCUE § 11190 (Failure to maintain records)
	Lasix 40	N/A	X	X		X	X*	X*	X*	
1/5/78	Biphetamine 20	60	X	X	X		X*	X*	X*	
	Norpramine 25	100	X	X	X		X*	X*	X*	
2/2/78	" "	N/A	X	X	X		X*	X*	X*	
	Obetrol 20	60	X	X	X		X*	X*	X*	
3/13/78	Biphetamine 20	60	X	X	X		X*	X*	X*	
	Lasix 40	N/A	X	X	X		X*	X*	X*	
	Norpramine 25	"	X	X	X		X*	X*	X*	
4/7/78	Norpramine 50	"	X	X	X		X*	X*	X*	
	Biphetamine 20	60	X	X	X		X*	X*	X*	
5/8/78	" "	"	X	X	X		X*	X*	X*	
	Norpramine 50	N/A	X	X	X		X*	X*	X*	
6/9/78	" "	100	X	X	X		X*	X*	X*	
	Lasix 40	N/A	X	X	X		X*	X*	X*	
	Biphetamine 20	40	X	X	X		X*	X*	X*	
7/7/78	" "	60	X	X	X		X*	X*	X*	
	Norpramine 50	N/A	X	X	X		X*	X*	X*	
	Lasix 40	"	X	X	X		X*	X*	X*	

PATIENT

J.D.

page 3

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	R&P CODE 2399.5 (No good faith exsm)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive (prior to 1978))	B&P CODE § 2361(a) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	R&S CODE § 11190 (Failure to maintain records)
9/27/76	Elavil 25	N/A	X	X		X				
	Biphetamine 20	30	X	X		X				
10/19/76	"	N/A	X	X		X				
	Elavil 25	"	X	X		X				
11/2/76	Elavil 50	100	X	X		X				
	Biphetamine 20	30	X	X		X				
	Lasix 40	N/A	X	X		X				
12/15/76	Biphetamine 20	30	X	X		X				
	Elavil 50	100	X	X		X				
1/4/77	"	N/A	X	X		X				
	Biphetamine 20	"	X	X		X				X
2/22/77	"	"	30	X	X	X	X*	X*		
	Lasix 40	N/A	X	X		X	X*	X*	X*	
4/18/77	Elavil 25	"	X	X		X	X*	X*	X*	
5/7/77	Biphetamine 20	30	X	X		X	X*	X*	X*	
5/31/77	"	"	N/A	X	X	X	X*	X*	X*	X
6/23/77	"	"	N/A	X	X	X	X*	X*	X*	
7/19/77	"	"	30	X	X	X	X*	X*	X*	

PATIENT

J.D. #7

page 4

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	MIS-CUE § 11190 (Failure to maintain records)
	Elevil 25	N/A	X	X		X	X*	X*	X*	
	Lasix 40	"	X	X		X	X*	X*	X*	
8/19/77	" "	"	X	X		X	X*	X*	X*	
	Elevil 50	"	X	X		X	X*	X*	X*	
	Biphetamine 20	60	X	X		X	X*	X*	X*	
9/12/77	" "	"	X	X		X	X*	X*	X*	
	Elevil 50	N/A	X	X		X	X*	X*	X*	
	Lasix 40	"	X	X		X	X*	X*	X*	
10/7/77	Biphetamine 20	"	X	X		X	X*	X*	X*	X
	Norpramine 25	"	X	X		X	X*	X*	X*	
	Lasix 40	"	X	X		X	X*	X*	X*	
11/4/77	Biphetamine 20	60	X	X		X	X*	X*	X*	
	Norpramine 25	100	X	X		X	X*	X*	X*	
	Lasix 40	N/A	X	X		X	X*	X*	X*	
12/7/77	Biphetamine 20	50	X	X		X	X*	X*	X*	
	Norpramine 25	N/A	X	X		X	X*	X*	X*	
12/13/77	" "	"	X	X		X	X*	X*	X*	
	Biphetamine 20	60	X	X		X	X*	X*	X*	

**PATIENT**

J.D. #7

DATE 6

\* These charges of gross negligence, incompetence, and repeated negligent acts are based upon the fact that respondent continued to prescribe, and in fact, increased the amounts of controlled substances and dangerous drugs prescribed to J.D., an unstable person, even after she overdosed on Elavil (Amitriptyline), requiring hospitalization.

## PATIENT

B.I.G., #8

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	MES CODE § 11190 (Failure to maintain records)
4/13/77	Biphetamine 20	30		X						
	Elavil 25	100		X						
5/25/77	Biphetamine 20	30		X						X
	Elavil 25	120		X						
	Lasix 40	N/A	X	X		X				
9/7/77	Elavil 25	100		X		X	X*		X*	
10/6/77	Biphetamine 20	30		X		X	X*	X*	X*	
	Elavil 50	100	X	X		X	X*	X*	X*	
	Lasix 40	N/A		X		X	X*	X*	X*	

\* The charges of gross negligence, incompetence and repeated negligent acts are based upon the facts that respondent prescribed the drugs on 9/1/77 and 10/6/77 to B.G. believing that she was or might have been pregnant and that respondent increased the dosage of the Elavil on 10/6/77 without any medical reason or examination. On or about 10/21/77, Beverly Carter overdosed and died on Amitriptyline (Elavil), Nortripaque, and alcohol.

PATIENT

D.A. #9

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	B&P CODE § 11190 (Failure to maintain records)
6/19/75	Dexedrine 15	N/A	X	X		X				
7/30/75	" "	30	X	X		X				
9/2/75	Obetrol 20 1:80 Ortho Novum	N/A	X	X		X				
7/17/77	Obetrol 20	60	X	X		X				
	Lasix 40	N/A	X	X		X				
	Elavil 25	"	X	X		X				
8/15/77	Obetrol 20	60	X	X		X				
	Elavil 50	100	X	X		X				
	Lasix 40	100	X	X		X				
6/13/77	Obetrol 20	60	X	X		X				
	Elavil 50	100	X	X		X				
	Lasix 40	100	X	X		X				
8/5/77	Obetrol 20	60	X	X		X				
	Elavil 50	100	X	X		X				
	Lasix 40	100	X	X		X				
9/2/77	Obetrol 20	60	X	X		X				
	Norpramine 50	100	X	X		X				

PATIENT NAME: D.A. #9

page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	MES CODE § 11190 (Failure to maintain records)
	Lasix 40	N/A	X	X		X				
	Ortho Novum			X						
10/3/77	Obetrol 20	60	X	X		X				
	Norpramine 50	100	X	X		X				
	Lasix 40	N/A	X	X		X				
10/26/77	Obetrol 20	60	X	X		X				
	Norpramine 50	100	X	X		X				
11/28/77	Obetrol 20	60	X	X		X				
	Norpramine 50	N/A	X	X		X				
12/21/77	Obetrol 20	60	X	X		X				
	Norpramine 50	100	X	X		X				
1/9/78	Obetrol 20	60	X	X		X				
	Lasix 40	N/A	X	X		X				
1/31/78	Obetrol 20	60	X	X		X				
	Norpramine 50	100	X	X		X				
2/27/78	Obetrol 20	60	X	X		X				
	Norpramine 50	100	X	X		X				
	Lasix 40	N/A	X	X		X				

PATIENT NAME: D.A. #9

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PATIENT

E.A. #10

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
10/6/76	Esrctrol 15	30	X			X				
10/20/76	Biphetamine 20	30	X			X				
11/8/76	"	" N/A	X			X				X
11/22/76	"	" 30	X			X				
12/3/76	"	" "	X			X				
12/17/76	"	" N/A	X			X				
1/2/77	"	" "	X			X				
1/13/77	"	" 30	X			X				
1/27/77	"	" N/A	X			X				X
2/11/77	"	" "	X			X				
2/24/77	"	" "	X			X				X
3/8/77	"	" 30	X			X				
3/18/77	"	" N/A	X			X				
3/25/77	"	" "	X			X				
4/1/77	"	" "	X			X				
4/13/77	"	" "	X			X				
4/26/77	"	" "	X			X				
5/31/77	"	" "	X			X				

PATIENT

E.A. #10

page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam.)	B&P CODE § 700 (Clearly excessive)	N&P CODE 2361.5 (Clearly excessive prior to 1978)	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52351(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
6/24/77	Biphetamine 20	30	X			X				
7/5/77	"	"	X			X				
7/15/77	"	"	N/A	X		X				X
7/26/77	"	"	30	X		X				
7/7/77	"	"	X			X				
8/11/77	"	"	X			X				
8/22/77	"	"	X			X				X
8/31/77	"	"	N/A	X		X				X
9/9/77	"	"	X			X				
9/22/77	"	"	30	X		X				
10/21/77	"	"	30	X		X				
11/11/77	"	"	X			X				
11/18/77	"	"	60	X		X				X
12/22/77	Obetrol	N/A	X			X				
1/7/78	Biphetamine 20	60	X			X				
1/22/78	"	"	X			X				
2/15/78	Duxadrine 15	"	X			X				
3/1/78	Mphetamine 20	"	X			X				

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J.C. #11  
page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
7/25/73	Dexedrine 15	60				X				
9/26/73	"	"	N/A				X			
11/9/73	"	"	30				X			
12/6/73	"	"	N/A				X			
1/7/74	"	"	N/A				X			
1/28/74	"	"	"				X			
3/5/74	"	"	"				X			
3/27/74	"	"	"				X			
5/5/74	"	"	"				X			
6/27/74	"	"	"				X			
8/12/74	"	"	"				X			
9/27/74	"	"	60				X			
10/17/74	"	"	"				X			
11/26/74	"	"	"				X			
10/74	"	"	"				X			
1/7/75	"	"	N/A				X			
3/10/75	"	"	60				X			
5/11/75	"	"	"				X			
						50.				

**PATIENT**

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PATIENT

J.C. #11  
page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 703 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incur- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
7/28/75	Dexedrine 15	60				X				
8/22/75	"	"				X				
9/8/75	"	"				X				
10/8/75	"	"				X				
1/1/76	"	"				X				
2/20/76	"	"				X				
3/23/76	"	"				X				
5/23/76	"	"				X				
7/1/76	"	"				X				
8/6/76	"	"				X				
8/30/76	"	"				X				
9/22/76	"	"				X				
10/18/76	"	"				X				
11/12/76	"	"				X				
1/1/76	"	"	N/A			X				
1/14/77	"	60				X				
3/8/77	"	"				X				
4/14/77	Ritalin 20	30				X				

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J.C. #11  
page 3

DATE	DRUG	QUAN- TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S COE § 11190 (Failure to maintain records)
						X				
5/16/77	Dexedrine 15	60				X				
6/7/77	"	"				X				
7/27/77	"	"				X				
8/16/77	"	"	N/A			X				X
9/1/77	"	"	60			X				
9/18/77	"	"	"			X				
12/20/77	"	"	"			X				
2/1/78	"	"	"			X				
3/23/78	"	"	"			X				
4/7/78	"	"	"			X				
5/5/78	"	"	"			X				
6/1/78	"	"	"			X				
7/6/78	"	"	"			X				
8/1/78	"	"	"			X				
8/10/78	"	"	"			X				
9/12/78	"	"	"			X				

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C.C. #12

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive prior to 1978)	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE: § 11190 (Failure to maintain records)
11/15/76	Biphetamine 20	30								X
12/15/76	"	" N/A								X
1/20/77	"	" "								X
2/16/77	"	" "								X
3/1/77	"	" 30								X
5/17/77	"	" N/A								X
5/24/77	"	" "								X
7/6/77	"	" "								X
8/12/77	"	" 30				X				
8/29/77	"	" "				X				
10/7/77	"	" 60 X				X				X
"	Nembutal gr.	1 1/2 20	X							
10/31/77	Biphetamine 20	60 X				X				X
"	Nembutal gr.	1 1/2 20	X			X				X
11/7/77	"	" N/A X				X				X
"	Biphetamine 20	60 X				X				X
12/7/77	"	" "	X			X				
"	Nembutal gr.	1 1/2 gr. N/A	X			X				

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C.C. #12  
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D.C. #13

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	H&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 2361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
7/7/76	Biphetamine 20	30	X	X		X				
8/12/76	Dexedrine 5	N/A	X	X		X				
9/17/76	Eskatrol 15	30	X	X		X			X	
	Quaalude 150	10	X	X		X			X	
10/8/76	Dexedrine 10	60	X	X		X				
12/16/76	"		X	X		X			X	
	Quaalude 150	30	X	X		X			X	
1/20/77	Dexedrine 10	60	X	X		X				X
2/15/77	Obetrol 20	N/A	X	X		X				X
4/5/77	Preludin 75	N/A	X	X		X				
6/16/77	Dexedrine 5	100	X	X		X				
7/13/77	Dexedrine 10	60	X	X		X			X	
	Thorazine 25	N/A	X	X		X			X	
	Meprobamate	N/A	X	X		X				X
7/77	Preludin 75	N/A	X	X		X				X
9/8/77	Dexamyl 5	100	X	X		X				
11/4/77	Biphetamine 20	60	X	X		X				
	Valium 10	50	X	X		X				

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D.C. #13

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PATIENT

P.A.C. #14

PATIENT NAME: M.D. #15

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 2361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
2/3/77	Eskatrol 15	N/A	X			X				X
3/17/77	Obetrol 20	"	X			X				X
3/29/77	Meprobamate 400	"	X			X				
4/15/77	Biphetamine 20	30	X			X				
5/3/77	"	" "	X	X		X	X	X		
9/9/77	"	" "	X	X		X	X	X	X	
10/7/77	"	" "	X	X		X	X	X	X	
10/28/77	"	" "	X	X		X	X	X	X	
12/2/77	"	" "	X	X		X	X	X	X	
1/4/78	Biphetamine 20	60	X	X	X		X	X	X	
2/6/78	"	" "	X	X	X		X	X	X	
3/6/78	"	30	X	X	X		X	X	X	
4/5/78	"	60	X	X	X		X	X	X	
5/2/78	"	" "	X	X	X		X	X	X	
1	Seronal 1 1/2	N/A	X	X	X		X	X	X	
5/26/78	Biphetamine 20	60	X	X	X		X	X	X	
7/6/78	"	" "	X	X	X		X	X	X	
	Lasix 40	N/A	X	X	X					
9/5/78	Biphetamine 20	60	X	X	X		X	X	X	
	Lasix NA	N/A	X	X	X	(p. 38)				

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S.D. #16

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive prior to 1978)	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
2/23/77	Obetrol 20	N/A		X		X		X		X
	Nembutal 1-1/2	N/A		X		X		X		
4/29/77	Desoxyn 15	N/A		X		X		X		X
	Tuinal 3 gr.	N/A		X		X		X		
6/ " 77	Obetrol 20	N/A		X		X		X		X
	Tuinal 3 gr.	30		X		X		X		
6/5/77	" "	"		X		X		X		
	Obetrol 20	30		X		X		X		
8/12/77	Biphetamine 20	60		X		X		X		
	Tuinal 3 gr.	N/A		X		X		X		
9/9/77	" "	30		X		X		X		
	Biphetamine 20	60	X	X		X		X		
10/6/77	" "	60	X	X		X		X		
	Tuinal 3 gr.	30		X		X		X		
11/ " 77	" "	30		X		X		X		
	Biphetamine 20	60	X	X		X		X		
12/1/77	" "	"	X	X		X		X		
	Tuinal 3 gr.	30		X		X		X		

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S.D. #16

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PATIENT

C.L. #17  
page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive prior to 1978))	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
6/18/76	Dexedrine 5	100	X	X		X		X		
7/12/76	" "	N/A	X	X		X		X		
7/13/76	Valium 5	N/A	X	X		X		X		
8/11/76	Dexedrine 5	N/A	X	X		X		X		
9/1/76	" "	100	X	X		X		X		
	Valium 5	100	X	X		X		X		
9/27/76	" "	100	X	X		X		X		
	Dexedrine 5	N/A	X	X		X		X		
10/19/76	" "	100	X	X		X		X		
	Valium 5	N/A	X	X		X		X		
11/10/76	Dexedrine 5	100	X	X		X		X		
12/2/76	" "	100	X	X		X		X		
12/29/76	" "	N/A	X	X		X		X		
1/17/77	" "	100	X	X		X		X		
	Valium 5	100	X	X		X		X		
2/1/77	Dexedrine 5	N/A	X	X		X		X		
	Valium 5	100	X	X		X		X		
3/1/77	" "	N/A	X	X		X		X		
	Dexedrine 5	N/A	X	X		X		X		

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C.L. #17

page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exa- m)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excess- ive)	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repetited similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
4/1/77	Dexedrine 15	N/A	X	X		X		X		X
	Valium 5	N/A	X	X		X		X		
4/12/77	" "	N/A	X	X		X		X		
	Dexedrine 5	100	X	X		X		X		
5/1/77	" "	N/A	X	X		X		X		X
	Valium 5	N/A	X	X		X		X		
6/8/77	" "	N/A	X	X		X		X		
	Dexedrine 5	N/A	X	X		X		X		
7/7/77	" "	100	X	X		X		X		
	Valium 5	100	X	X		X		X		
7/29/77	Norpramine 25	N/A	X	X		X		X		
	Dexedrine 5	100	X	X		X		X		
8/5/77	" "	100	X	X		X		X		
	Norpramine 25	100	X	X		X		X		
8/7/77	Dexedrine 5	100	X	X		X		X		
	Norpramine 25	100	X	X		X		X		
9/27/77	Biphetamine 20	60	X	X		X		X		
	Norpramine 50	N/A	X	X		X		X		

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C.I. #17  
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DATE	DRUG	QUAN-TITY	B&P CODE § 2393.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	S&P C DE § 236.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2362(c) (Repetiti- on of similar acts of negligence)	HSS CDE 11190 (Failure to maintain records)
10/21/77	Norpramine 50	100	X	X		X			X	
	Obetrol 20	60	X	X		X			X	
11/17/77	Dexedrine 5	100	X	X		X			X	
	Norpramine 50	100	X	X		X			X	
12/16/77	" "	100	X	X		X			X	
	Dexedrine 5	100	X	X		X			X	
1/16/78	" "	N/A	X	X	X				X	
	Norpramine 50	N/A	X	X	X				X	
2/2/78	Dexedrine 5	100	X	X	X				X	
3/2/78	Biphetamine 20	60	X	X	X				X	
	Norpramine 50	N/A	X	X	X				X	
4/3/78	" "	N/A	X	X	X				X	
	Biphetamine 20	60	X	X	X				X	
5/1/78	" "	60	X	X	X				X	
5/1/78	" "	60	X	X	X				X	
	Norpramine 25	N/A	X	X	X				X	
7/5/78	Biphetamine 20	60	X	X	X				X	
8/4/78	" "	60	X	X	X				X	
	Norpramine 25	N/A	X	X	X				X	

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CJL #17

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R.L. #18  
page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	H&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&P CODE § 11190 (Failure to maintain records)
7/7/77	Obetrol 20	30		X		X				
	Lasix 40	N/A	X	X			X			
	Elavil 25	N/A		X			X			
8/21/77	" "	N/A		X			X			
	Lasix 40	N/A	X	X			X			
	Obetrol 20	30		X			X			
9/8/77	" "	N/A		X			X			X
	Elavil 50	N/A		X			X			
	Lasix 40	N/A	X	X			X			
10/6/77	" "	N/A	X	X			X			
	Elavil 40	N/A		X			X			
	Obetrol 20	60		X			X			
11/4/77	Biphetamine 20	60		X			X			
	Elavil 50	N/A		X			X			
	Lasix 40	N/A	X	X			X			
12/6/77	" "	N/A	X	X			X			
	Elavil 50	100		X			X			
	Biphetamine 20	60		X			X			

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R.L. #18  
page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith : exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(g) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
1/16/78	Biphetamine 20	60		X	X					
2/15/78	Eskatrol 15	60		X	X					
	Lasix 40	N/A	X	X	X					
3/15/78	" "	N/A	X	X	X					
	Norpramine 25	N/A			X	X				
	Biphetamine 20	60			X	X				
3/23/78	" "	60			X	X				
4/13/78	" "	30			X	X				
5/9/78	" "	60			X	X				
	Norpramine 50	N/A			X	X				
	Lasix 40	N/A	X	X	X					
6/6/78	" "	N/A	X	X	X					
	Norpramine 50	N/A			X	X				
	Biphetamine 20	60			X	X				
7/1/78	" "	60			X	X				
7/14/78	Norpramine 50	N/A			X	X				
	Lasix 40	N/A	X	X	X					
8/21/78	" "	100		X	X	X				

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R.L. #18

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**PATIENT**

S.M. #19

PATIENT

C.R. #20

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PATIENT	DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	MIS-CODE § 11190 (Failure to maintain records)
	3/18/76	Obetrol 20	N/A		X						
		Lasix 40	"	X	X		X				
	9/14/76	Biphetamine 20	"		X						
	10/21/76	Obetrol 20	"		X		X				
		Lasix 40	"	X	X			X			
	11/16/76	Eskatrol 15	30		X			X			
	12/10/76	"	"		X			X			
	1/3/77	Obetrol 20	60		X			X			
	2/25/77	"	30		X			X			
	4/5/77	"	"		X			X			
		Lasix 40	100	X	X			X			
	8/26/77	Dexedrine 15	30		X			X			
		Lasix 40	N/A	X	X			X			
	9/30/77	Dexedrine 15	30		X			X			
	10/13/77	Obetrol 20	60		X			X			
		Lasix 40	N/A	X	X			X			
	1/18/78	"	"	X	X	X					
		Biphetamine 20	60		X		X				

PATIENT.

C.R. #20

Page 2

DATE	DRUG	QUAN- TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1976])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompa- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	B&P CODE § 11190 (Failure to maintain records)
2/16/78	Dexedrine 15	60		X	X					
	Lasix 40	100	X	X	X					
3/16/78	" "	N/A	X	X	X					
	Biphetamine 20	60		X	X					
4/78	" "			X	X					
	Lasix 40	N/A	X	X	X					
5/12/78	" "	N/A	X	X	X					
	Biphetamine 20	60		X	X					
6/9/78	" "	"		X	X					
	Lasix 40	N/A	X	X	X					
7/13/78	" "	"	X	X	X					
	Biphetamine 20	60		X	X					
8/11/78	" "	"		X	X					
	Lasix 40	N/A	X	X	X					
8/18/78	Biphetamine 20	60		X	X					
	Lasix 40	N/A	X	X	X					

PATIENT

S.S. #21

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	RES. CODE § 11190 (Failure to maintain records)
11/20/75	Dexedrine 15	N/A		X		X				
6/2/76	" "	"		X		X				
7/1/76	Biphetamine 20	30		X		X				
8/11/76	" "	"		X		X				
9/7/76	" "	"		X		X		X		X
	Thorazine 25	N/A		X		X		X		X
12/14/76	Biphetamine 20	"		X		X				X
1/7/77	" "	30		X		X				X
1/26/77	" "	N/A		X		X				X
2/22/77	Obetrol 20	"		X		X				
	Thorazine 25	"		X		X				X
3/25/77	Dexedrine 5	"		X		X				
4/20/77	Dexedrine 15	30		X		X				
6/10/77	Thorazine 25	N/A		X		X				
7/7/77	Dexedrine 5	100		X		X				
10/22/77	Obetrol 20	30		X		X				
1/3/78	Dexedrine 5	100		X	X					
2/1/78	" "	"		X	X					

PATIENT

S.S. #21

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PATIENT

S.A.S. #22

page 1

PATIENT DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi-cal indica-tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Cross negli-gence)	B&P CODE § 523(1)(d) (Incompe-tence)	B&P CODE § 2361(c) (Re-peated similar acts of negli-gence)	MES CODE § 11190 (Failure to main-tain records)
4/14/77	Eskatrol 15	30		X		X				
	Lasix 40	N/A	X	X		X				
6/7/77	" "	"	X	X		X				
	Obetrol 20	N/A		X		X				X
7/77	" "	"		X		X				X
8/1/77	Biphetamine 20	"		X		X				X
9/2/77	" "	"		X		X				X
10/4/77	" "	60		X		X				
	Lasix 40	N/A	X	X		X				
11/3/77	" "	"	X	X		X				
	Biphetamine 20	60		X		X				
12/2/77	" "	"		X		X				
	Lasix 40	N/A	X	X		X				
1/18/78	" "	"	X	X	X					
	Biphetamine 20	60		X	X					
2/16/78	Dexedrine 15	60		X	X					
3/16/78	Biphetamine 20	60		X	X					
4/17/78	" "	"		X	X					
	Lasix 40	N/A	X	X	X					

PATIENT

S.A.S. #22

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PATIENT

R.S. #23

page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
3/15/77	Obetrol 20	N/A		X		X				X
	Lasix 40	"	X	X		X				
4/15/77	" "	100	X	X		X				
	Biphetamine 20	30		X		X				X
7/7/77	" "	N/A		X		X				
	Nembutal gr. 1 1/2	6		X		X			X	
7/12/77	Biphetamine 20	N/A		X		X				
8/30/77	" "	60		X		X				
	Lasix 40	N/A	X	X		X				
10/6/77	" "	"	X	X		X				
	Biphetamine 20	60		X		X				
11/3/77	" "	"		X		X				
	Lasix 40	100	X	X		X				
12/2/77	Biphetamine 20	60		X		X				
1/1/78	" "	"		X	X					
2/7/78	Doxedrine 15	60		X	X					
	Lasix 40	N/A	X	X	X					
3/7/78	Doxedrine 15	60		X	X					

## PATIENT

R.S. #23  
page 2

PATIENT

V.S. #24  
page 1

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361(b) (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	H&S CODE § 11190 (Failure to maintain records)
9/9/75	Dexedrine 15	N/A		X						
	Elavil 25	"	X	X		X				
9/24/75	Dexedrine 15	"		X						
10/22/75	"	"		X			X			
	Elavil 25	"	X	X			X			
11/14/75	"	"		X						X
	Dexedrine 15	"		X			X			
6/1/77	"	"		X			X			
	Elavil 25	"	X	X			X			
6/24/77	"	"	X	X			X			
	Dexedrine 15	30		X			X			
7/20/77	"	"	30		X		X			
	Elavil 25	N/A	X	X			X			
8/23/77	Elavil 50	"	X	X			X			
	Dexedrine 15	30		X			X			
9/26/77	"	"	60	X	X		X			
	Elavil 50	N/A	X	X			X			
	Lasix 40	"	X	X			X			

PATIENT

V.S. #24

page 2

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive (prior to 1978))	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 52361(d) (Incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	HCAS CODE § 11190 (Failure to maintain records)
11/17/77	Lasix 40	N/A	X	X		X				
	Obetrol 20	"		X		X				X
	Elavil 50	"	X	X		X				
12/15/77	" "	"	X	X		X				
	Dexedrine 15	60	X	X		X				
	Lasix 40	N/A	X	X		X				
1/26/78	" "	"	X	X	X					
	Elavil 50	"	X	X	X					
	Obetrol 20	60	X	X	X					
2/17/78	" "	"	X	X	X					
	Elavil 50	N/A	X	X	X					
	Lasix 40	"	X	X	X					
3/16/78	" "	"	X	X	X					
	Elavil 50	N/A	X	X	X					
	Obetrol 20	60	X	X	X					
4/10/78	" "	"	X	X	X					
	Elavil 50	100	X	X	X					
	Lasix 40	N/A	X	X	X					

REDACTED

BEFORE THE  
BOARD OF MEDICAL QUALITY ASSURANCE  
DIVISION OF MEDICAL QUALITY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

13 In the Matter of the Accusation  
Against:

NO. D-2490

PAUL JARAND, M.D.  
705 Palm Avenue

**SUPPLEMENTAL  
ACCUSATION**

Physician's and Surgeon's  
Certificate No. A-15602

**Respondent.**

20 Robert Rowland alleges:

21           20. Complainant refers to the allegations contained  
22       in paragraphs 1 - 19 of the accusation in the Matter of the  
23       Accusation Against Paul Jarand, M.D., No. D2490, and incor-  
24       porates the same herein by this reference as if fully set  
25       forth.

26 21. At all relevant times, Ritalin was a schedule  
27 II controlled substance as defined by Health and Safety Code

1 section 11055, and a dangerous drug as defined by Business  
2 and Professions Code section 4211(k).

3 22. At all relevant times, Elavil, Dalmane, and  
4 Norpramine were classified as dangerous drugs by Business and  
5 Professions Code section 4211(k).

6 23. The license of respondent is subject to disci-  
7 plinary action pursuant to Business and Professions Code section  
8 2399.5 because respondent prescribed the dangerous drugs and  
9 controlled substances listed in exhibit B, the contents of  
10 which are incorporated herein, to patient S.P. without con-  
11 ducting a sufficient and necessary medical examination, and  
12 without there being a valid medical indication for the drug  
13 prescribed.

14 24. The license of respondent is subject to disci-  
15 plinary action pursuant to Business and Professions Code section  
16 700 because respondent prescribed clearly excessive amounts of  
17 controlled substances and dangerous drugs to patient S.P. as set  
18 forth in exhibit B.

19 25. The license of respondent is subject to disci-  
20 plinary action pursuant to Business and Professions Code section  
21 2391.5 because respondent violated Health and Safety Code  
22 section 11190 in that respondent failed to keep a record of the  
23 amount, pathology and purpose of the Biphetamine prescribed for  
24 patient S.P. on 4/26/77, 6/3/77, 7/29/77, and 9/27/77, as  
25 more particularly alleged in exhibit E.

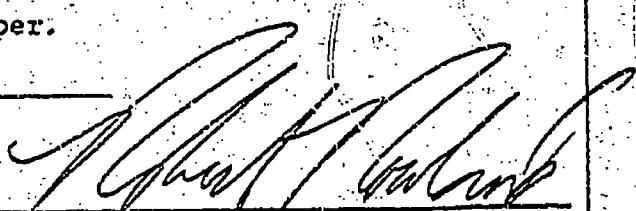
26 26. The license of respondent is subject to disci-  
27 plinary action pursuant to Business and Professions Code section

1 2399.5 because on or about 8/27/76, respondent prescribed  
2 100 10 mg. Ritalin capsules for Kari K [REDACTED] without a  
3 good faith examination or medical indication, in that  
4 respondent prescribed the Ritalin for Kari without ever  
5 examining, seeing, or talking to her.

6 27. The license of respondent is subject to disci-  
7 plinary action pursuant to Business and Professions Code section  
8 2361(b) because respondent prescribed all of the drugs listed  
9 on exhibit B from March 27, 1977 to August 17, 1979, to patient  
10 S.P. after respondent knew that she had been treated for an  
11 overdose of Elavil on March 14, 1977, at the Bay General  
12 Hospital.

13 WHEREFORE, complainant requests that the Division of  
14 Medical Quality hold a hearing on the matters alleged, and  
15 following the hearing, take such action as provided for in  
16 section 2372 of the Business and Professions Code, and take  
17 such other action as may be proper.

18 Dated: April 10, 1980



19  
20 ROBERT ROWLAND  
21 Executive Director  
22 Board of Medical Quality

23 Complainant  
24  
25  
26  
27

PATIENT NAME: S.P. #25

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indica- tion)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive [prior to 1978])	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 2361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)
8/27/76	Elavil 25	N/A		X					
	Dexedrine 15	30		X					
	Lasix 40	N/A	X	X					
9/30/76	Elavil 25	N/A		X					
	Biphetamine 20	30		X					
12/2/76	Biphetamine 20	N/A		X					
	Elavil 25	"		X					
12/30/76	"	"		X					
	Biphetamine 20	"		X					
2/1/77	"	"	X	X					
	Elavil 25	100		X					
3/22/77	"	N/A		X					
	Biphetamine 20	30		X	X				
4/26/77	"	"	N/A	X	X				
	Elavil 50	"		X					
6/3/77	"	" 25	"	X					
	Biphetamine 20	"		X	X				
7/29/77	"	" "	X	X					
	Lasix 40	"	X	X					

ATTEST NAME: S.P. #25 (page 2)

DATE	DRUG	QUAN-TITY	B&P CODE § 2399.5 (No medi- cal indi- cation)	B&P CODE 2399.5 (No good faith exam)	B&P CODE § 700 (Clearly excessive)	B&P CODE § 2361.5 (Clearly excessive prior to 1970)	B&P CODE § 2361(b) (Gross negli- gence)	B&P CODE § 2361(d) (incompe- tence)	B&P CODE § 2361(c) (Repeated similar acts of negligence)	B&P CODE 11190 (Failure to maintain records)
1/29/77	Elavil 25	N/A		X						
1/27/77	"	"		X						
10/31/77	Biphetamine 20	"	X	X						X
12/2/77	Elavil 25	30	X	X						
12/2/77	"	N/A		X						
	Biphetamine 20	30	X	X						
1/9/78	"	"	X	X						
5/23/78	"	"	X	X						
	Norpramine 25	N/A		X	X					
6/14/78	"	"		X	X					
	Biphetamine 20	30	X	X						
7/11/78	"	"	X	X						
	Norpramine 25	100		X	X					
8/7/78	Biphetamine 20	60	X	X	X					
	Norpramine 25	N/A		X	X					
9/7/78	"	"		X	X					
	Dalmane 30	"	X	X						
	Biphetamine 20	60	X	X	X					

PATIENT NAME: S.P. #25 (page 3)